

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS**

UNITED STATES OF AMERICA

V.

NO. 4:12-CR-00182-KGB

ROBERT DOUGLAS COOLEY

AGREED PROTECTIVE ORDER

Based upon the agreement of counsel for the United States and the Defendant, the Court hereby enters the following Agreed Protective Order pursuant to Fed. R. Crim. P. 16(d)(1).

1. Discovery materials in this case include photographs and video/audio recordings of controlled purchases made by a confidential source. Prior to delivering copies of these photographs and video/audio recordings to defense counsel, the United States requests the following conditions be put in place. The conditions set forth below are requested due to witness security issues.

2. Defense counsel and Defendant shall not disclose the photographs or recordings directly or indirectly to any person, except those assisting the defense, persons who are interviewed as potential witnesses, potential experts, or other authorized persons, during the course of the investigation and defense of this case. Defense counsel and Defendant shall not use the photographs or recordings in any fashion outside the framework of this litigation. Therefore, counsel for the parties have agreed, and the Court orders, that any and all photographs or recordings produced shall be used solely for the purpose of litigating this action and that those photographs and recordings shall not be disclosed except as permitted herein.

3. While counsel may review the photographs and recordings with the Defendant, the Defendant shall not be provided with the originals or copies of the photographs or recordings. The

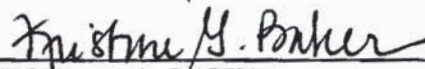
photographs and recordings shall not be duplicated without prior written authorization from the Court. Counsel for Defendant and the Defendant are strictly forbidden from disseminating any photographs and recordings covered by this Order. Counsel and Defendant understand and agree that a violation of this provision of the Agreed Protective Order could subject them to a finding of contempt of Court.

4. The photographs and recordings shall be maintained in a secure storage space at the respective offices of defense counsel or maintained under the custody and control of defense counsel when not in the secure storage space. Counsel for the Defendant shall return all photographs and recordings and any copies thereof to AUSA Kristin Bryant immediately upon the conclusion of the trial in this case.

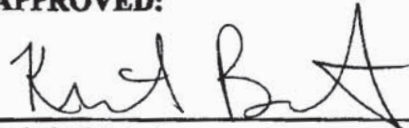
5. When disclosing the discovery materials to an authorized person, the Defendant's counsel must inform the authorized person that the materials are provided subject to the terms of this Protective Order and that the authorized person must comply with the terms of this Protective Order.


6. Defendant's counsel will inform the Defendant of the provisions of this Protective Order, and direct them not to disclose or use any information contained in the government's discovery in violation of this Protective Order. However, nothing contained in the Protective Order will preclude any party from applying to the Court for further relief or for modification of any provision hereof.

IT IS SO ORDERED THIS 18 DAY OF September 2012.


KRISTINE G. BAKER
UNITED STATES DISTRICT JUDGE

APPROVED:


Kristin Bryant


Jason Files